## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

CONCHUA YAN	§	
	§	
Plaintiff	§	
	§	
VS.	§	CIVIL ACTION NO. 4:24-CV-00579
	§	
THE STATE OF TEXAS, LESLIE STARR	§	
BARROWS, WILLIAM PIGG,	§	
LORI DEANGELIS, PANOPYRA PLLC	§	
FUYAN WANG. YUANLI TANG, and	§	
JIAYIN ZHENG	§	

### ORIGINAL ANSWER OF DEFENDANT YUANLI TANG

NOW COMES Defendant YUANLI TANG and file this her original answer to Plaintiff's Second Amended Complaint (hereinafter "the complaint" or "Plaintiff's Complaint") and would respectfully show as follows:

#### I. DEFENDANT'S ANSWER

- 1. Defendant denies the facts plead in the bullet point list on page two of the complaint.
- 2. In paragraph 1 of the complaint, Defendants admit that Want operates Panopyra and deny the remainder of the facts plead therein.
- 3. Defendant denies the facts as plead in the first sentence of paragraphs 2-5 of the complaint.
- 4. Defendant denies the facts as plead in the paragraphs 6-8 of the complaint.
- 5. Defendant denies the jurisdictional facts plead in paragraphs II-1-4 of the complaint.
- 6. Defendant admits to the facts plead in the first sentence of Paragraph III-5 of the complaint and deny the facts plead in the remainder of the paragraph.

- 7. Defendant is without sufficient information at this time to admit monetary figures as plead in paragraphs III-6-9 of the complaint.
- 8. Defendants admit to the facts plead in paragraphs III-10-13 but deny the alleged federal jurisdiction facts plead in those paragraphs.
- 9. Defendant denies the facts plead in paragraphs IV-14-23 of the complaint.
- 10. Defendant denies the facts plead in paragraphs IV-24-25 of the complaint.
- 11. Defendant is without sufficient information to admit or deny the facts plead in paragraphs IV-26 of the complaint.
- 12. Defendant denies the facts plead in paragraphs IV-27-34 of the complaint.
- 13. Defendant denies the facts plead in paragraphs IV-35-37 of the complaint.
- 14. Defendant denies the facts plead in paragraphs IV-38-48 of the complaint.
- 15. Defendant denies the facts plead in paragraphs V-49-54 of the complaint.
- 16. Defendant denies the facts plead in paragraphs V-55-65 of the complaint.
- 17. Defendant denies the facts plead in paragraphs V-66-87 of the complaint.
- 18. Defendant denies the facts plead in paragraphs VI-88-102 of the complaint.
- 19. Defendant denies the facts plead in paragraphs VII-103-118 of the complaint.
- Defendant is without sufficient knowledge to admit or deny the facts plead in paragraphs
   VIII-119-135 of the complaint.
- 21. Defendant is without sufficient knowledge to admit or deny the facts plead in paragraphs IX-136-151 of the complaint.

### AFFIRAMTIVE DEFENSES

22. Defendants plead the affirmative defenses of limitations, collateral estoppel and res judicata

Respectfully Submitted,

/s/ C. Davis Chapman
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## /s/ Cody Martin

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ATTORNEYS FOR DEFENDANT YUANLI TANG

# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record via electronic service on this  $24^{th}$  day of December, 2024